201-14406

NCIC HPV
Sent by: Mary-Beth Weaver

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To: NCIC HPV, moran.matthew@epa.gov
cc:
cc:
Subject: Environmental Defense comments on Alkenyl Succinic Anhydride Category

Richard_Denison@environmentaldefense.org on 04/15/2003 01:24:14 PM

To: oppt.ncic@epamail.epa.gov, hpv.chemrtk@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA, Karen Boswell/DC/USEPA/US@EPA, sarah_loftus@americanchemistry.com
cc: MTC@mchsi.com, lucierg@msn.com, Karen_Florini@environmentaldefense.org, Richard_Denison@environmentaldefense.org

Subject: Environmental Defense comments on Alkenyl Succinic Anhydride Category

(Submitted via Internet 4/15/03 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and sarah_loftus@americanchemistry.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for the Alkenyl Succinic Anhydride Category.

The American Chemistry Council Petroleum Additives Panel, through its Health Environmental, and Regulatory Task Group (HERTG), has submitted a Robust Summary/Test Plan to describe available data and testing needs for two structurally related alkenyl succinic anhydrides and a diacid of one of these anhydrides. Based on their similar structures and uses, HERTG proposes that these chemicals be considered a category under EPA's High Production Volume Challenge Program. On review of this Robust Summary/Test Plan and related information, we support their consideration as a category.

This Test Plan is well-written and clearly describes the synthesis and uses of these chemicals. However, it is obvious that data describing the environmental fate and toxicities of these chemicals are quite limited. These chemicals are manufactured and/or formulated in manufacturing plants owned by members of HERTG, and are used at levels of 1 ppm or less as corrosion inhibitors in lubricants. According to the sponsor, manufacture and transport of these chemicals are controlled to limit occupational exposure in the plants, while environmental and consumer exposure is limited by the low concentrations at which they are used and by their low acute oral and dermal toxicity to mammals.

The Test Plan describes the objectives of each SIDS element required, but presents little data to address these elements. Our review of the Robust Summary indicates data describing the toxicity of these chemicals are limited to determinations of the biodegradation and toxicity of the diacid to algae and a determination of the LD50s of the anhydrides. The Test Plan proposes studies of the diacid to address each of the missing SIDS elements and bridging of data from those tests to predict the results for the other members of this category. Given the fact that, on contact with water, one of the anhydrides would be expected to hydrolyze to this diacid and the other anhydride would be expected to hydrolyze to a very similar diacid, we feel these proposed studies and bridging of data are appropriate.

Thank you for this opportunity to comment.

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